

Chapter XIII

Environmental Certification

A. GENERAL.

Environmental Technicians (manifest trackers) will analyze the paper audit trail submitted by the contractor to verify everything the contractor submits as evidence of services performed, ensure the disposal is in compliance with the environmental requirements and ensure the contractor complied with the terms and conditions of the contract. Overseas: Refer to the DRMSI Manifest Tracking Operating Instruction (see Enclosure 1).

B. PROCEDURES

1. The disposal contractor will submit a tracking packet to the Contracting Officer. The Contracting Officer will forward the tracking packet to Environmental for subsequent processing and certification. Overseas: Environmental technicians will contact their servicing Contracting Officer for guidance on procedures followed at their locations.

2. Environmental will establish a central document control area and a document control system where all invoice packets and related files will be logged in and out and accounted for at all times.

3. The manifest tracker will log out a tracking packet and the corresponding contract from the document control area. The tracker will ensure the contract includes copies of all related delivery orders and modifications. The tracking package should be reviewed within one day after log out by the tracker to determine whether it is proper and can be processed.

If any of the documents are missing, annotate this on DRMS Form 1878, Certification of

Services/Manifest Tracking Discrepancies, and return to the document control area. The packet will be returned to the Contracting Officer for correction. The packet will consist of:

a. DRMS Form 1878, Certification of Services/Manifest Tracking.

b. Signed cover letter from the contractor.

c. DRMS Form 1683, Manifest Tracking Log (two copies).

d. Legible/signed manifest(s).

e. Certificate of Destruction from final disposal facility.

f. DD Form 1155, Order for Supplies or Services (including pickup report) (two copies each).

g. Legible/signed Land Disposal Restriction notices.

4. The manifest tracker will verify the following and annotate all discrepancies on DRMS Form 1878 along with a recommended resolution:

a. Verify that the Contract Line Item Number (CLIN), item description and quantity on the pick-up report are the same as on the DD Form 1155.

b. Verify that the property was picked up within the timeframe allowed in the contract by checking the pick-up date on the pick-up report against the date in block 10 of the delivery order.

c. Verify the pick-up report information against the manifest.

d. Verify quantities against block 13 of the manifest or bills of lading.

e. Verify the following information on the manifest or Certificate of Recycling (For additional information on EPA manifesting, see Chapter VI, paragraph E6. May be supplemented overseas):

(1) Waste codes (reference 40 CFR 261.21-33).

(2) Department of Transportation (DOT) shipping name (reference 49 CFR 172.101).

(3) Generator's EPA number (block 1).

(4) Transporter (block 5) filled in with the appropriate EPA number and block 7 completed if two transporters were used.

(5) Signed and dated by DRMO employee (block 16).

(6) Signed and dated by each transporter (blocks 17 and 18).

(7) Discrepancies (block 19).

(8) Signed and dated by the disposal facility (block 20).

f. Verify the information on the DD Form 1683, CLIN or document number, item description, EPA waste code, quantity, pick-up and disposal manifest number, disposal facility, EPA handling code (40 CFR 264, Appendix IV) and disposal date.

g. Verify the disposal facility used an appropriate disposal method for each waste stream as referenced in 40 CFR 264, Appendix I, Table 2.

h. Verify that disposal occurred after the receipt date at the disposal facility. Verify that the quantity on the pick-up report is the same as the disposal quantity.

i. Verify that the disposal facility and transporters were approved on the contract.

j. Verify that contract timeframes were met.

k. Track empty containers from pickup to final disposal. For final disposal, containers could be crushed, shredded, recycled/reused, triple rinsed, and/or landfilled. The audit trail must be visible and annotated on the DD Form 1683.

l. Verify the quantities picked up against the DD Form 1155. Check modifications to the delivery orders that may reflect quantity or CLIN changes.

m. If packet is a retrack, annotate by checking the appropriate box in block 3 of the DRMS Form 1878. A retrack is a line item that has been previously tracked and not paid because of a discrepancy. In the case of a retrack, the previously tracked packet should be pulled from the document control area and used to ensure the contractor has addressed and resolved the discrepancy.

n. Line out and initial any item that is a major discrepancy as defined in Enclosure 2. This must be done on the DRMS Form 1878 and on the two copies going to the Contracting Officer.

5. Manifest tracking lines "approved" for payment must be entered into the BOSS system. The data input to BOSS generates a UV SF 591 certification and also acts as an internal control measure to make sure quantities and money amounts are correct. If quantities are not entered in BOSS correctly, a reject can occur. Return the tracking packet, including the original DRMS Form 1878 and two copies of the DD Form 1155 to the document control area.

6. Prepare a file copy of the tracking packet consisting of the following:

a. DRMS Form 1878 (2 copies).

b. Contractor's cover letter.

- c. DRMS Form 1683.
- d. Manifests with supporting certificates of destruction.
- e. DD Form 1155 (including pickup report) (2 copies of each).
- f. Any other supporting documentation.
- g. Land Disposal Restriction notices.